US ERA ARCHIVE DOCUMENT



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

4816-688 L> 432-1132

PESTICIDES AND TOXIC SUBSTANCES

A MULARY 24, 1990

| MEMORANDU | <u>M</u> | | | | |
|------------|---|---|--|-------------------------------|--------------|
| SUBJECT: | EPA Reg. No. | /File Symbol _ | 4816-551 | 5 4816-688 | : 4816-TE |
| . <i>2</i> | Permanone 10 H | 154 Conc. ; P. | | - | |
| FROM: | Olga Odiott Precautionar Registration | y Review Sect: Support Brand Division (H7 | ion E 1/29 ch 5-05C) | 1/90 | • |
| TO: | Registration | La Rocca 1- Habicide Division (H7) | | (PM \S_) | |
| | APPLICANT: | Fairfield | American | Coyporati | |
| | | 809 Han | rison Stre | et | |
| | | Frenchton | on NJ. | 08825 | |
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| FORMULAT | ION FROM LABEL | .: | and the second s | , | |
| Act | ive Ingredient ermethnin (2 3-(2,2-dic comboxylate | - phenoxyphenyl |) methyl (+/-; -,2-dime th |) Cis/trans Taylop ropere- | * by wt. |
| Ine | rt Ingredient(| s): | • • • • • | • • • • | 90.00% |
| | | | | Total | 100.0% |

BACKGROUND

The registrant is applying for: - amendments on EPA Reg. No. 4816-551 and 4816-688; - registration of 4816-TEE (4816-551, 4816-688 and 4816-TEE are identical products).

Reg. No. 4816-551 carries the signal word Warning and Reg. No. 4816-688 is mislabeled with the signal word Caution. The product was reformulated and a new eye irritation study submitted to justify downgrading of 4816-551 to Caution, and to retain the signal word for 4816-688 and it's split registration 4816-TEE. The study was conducted at Stillmeadow Inc. MRID No. 412178-02.

RECOMMENDATION

RSB/PRS finds the primary eye study acceptable to support the requested amendments/registrations. Nevertheless approval of the amendments/registration is not recommended until a new set of acute toxicity data is submitted on the reformulated product.

These products have been reformulated and changes in inert ingredients have been incorporated several times (12/17/79, 6/29/84, 6/23/88, 8/21/89) since first registered in November of 1979. Acute toxicity data, other than primary eye irritation studies; were not submitted in conjuction with the aforementioned changes in formulation. There are substantial differences between the current product formulation and the product that was originally tested and registered.

The following studies must be submitted on the new formulation: acute oral, acute dermal, acute inhalation, primary dermal irritation and dermal sensitization.

LABELING

The precautionary label review is pending submittance of outstanding data.

Note to PM:

A Memo by Dr. Stanley Gross in acute inhalation toxicity testing is included for registrant reference.

DATA REVIEW FOR ACUTE EYE IRRITATION TESTING (§81-4)

| Reviewer: 0. Odiott RRID No.: 412178-02 Resting Laboratory: 5till mi adm. Inc. Report Date: 9 mi 23,16 Report No. 4196-89 Report Date: 9 mi 23,16 Report Date: 9 mi 2 | | | | | | | | | | | |
|--|---------|-----------------------|--|--------------|------------------|--------------|-------------------|--------------|------------------|--|--|
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| Procedure (Devia | ation F | rom § | 81-4) | : | ., ., | | | | | | |
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| Results: | | | | | | | | | | | |
| | | | Obse | rvati | ons | | | | | | |
| | Hour | (number "positive"/nu | | | | | test | ed) | | | |
| | | | _ | 3 | 4 | 7 | 14 | 21 | | | |
| Cornea | 0/6 | 0/6 | 2 0/6 | 0/0 | 0/6 | | | = | | | |
| Opacity | | | | | 0/ | 0/ | | | | | |
| Iris | 0(6 | 0/6 | 0/4 | 0/6 | 16 | 16 | | | | | |
| Conjunctivae Redness | 16 | 0/6 | 0/6 | 0/6 | 0/6 | 0/6 | | | | | |
| Chemosis | 2/6 | 2/6 | 0/4 | | 0/6 | 0/4 | | | | | |
| Discharge | 4/4 | 0/6 | % | 0/6 | 0/6 | 0/6 | | | | | |
| Discharge | 1 24 | 1.5 | 10 | | | | | † | | | |
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| Comments: | | | | | | | | | | | |
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